

1 MILBANK LLP  
2 Linda Dakin-Grimm (State Bar #119630)  
3 Mark Shinderman (State Bar #136644)  
4 Marina Markarian (State Bar #340686)  
5 2029 Century Park East, 33rd Floor  
6 Los Angeles, CA 90067  
7 Telephone: 424-386-4404  
8 Facsimile: 213-629-5063  
9 Email: Ldakin-grimm@milbank.com  
Elizabeth Hamilton, *pro hac vice*  
55 Hudson Yards  
New York, New York 10001  
Telephone: 212-530-5000  
Facsimile: 212-530-5219  
Email: Ehamilton@milbank.com

10 *Pro Bono* Attorneys for Plaintiffs,  
11 Esvin Fernando Arredondo Rodriguez and A.F.A.J.

12 **UNITED STATES DISTRICT COURT**  
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

15 Esvin Fernando Arredondo  
16 Rodriguez Individually and  
17 A.F.A.J., a minor, by her guardian  
18 ad litem, Jeffrey Hamilton,

Plaintiffs,

v.

20 UNITED STATES OF AMERICA,

Defendant.

Case No.: CV 22-02845-JLS-AFM

**NOTICE OF MOTION FOR  
DOCUMENT PRODUCTION**

**[DISCOVERY DOCUMENT:  
REFERRAL TO MAGISTRATE  
JUDGE REQUESTED]**

Date: October 25, 2023

Time: 10:00 AM

25 Pursuant to Local Rule 37, on October 25, 2023, or as soon thereafter as  
26 counsel can be heard, Plaintiffs Esvin Fernando Arredondo Rodriguez ("Mr.  
27 Arredondo Rodriguez") and his minor daughter A.F.A.J. (together, "Plaintiffs") will  
28 motion the Court to order Defendant, the United States of America, to produce all

1 documents and materials responsive to Plaintiffs RFP 1, all materials produced in  
2 the other Family Separation Federal Tort Claims Act cases pending in Federal  
3 Courts across the country. The parties' respective positions are set forth in the Joint  
4 Stipulation filed concurrently with this Notice pursuant to Local Rule 37-2.

5  
6  
7 Dated: October 3, 2023

Respectfully Submitted,

8 **MILBANK LLP**

9 By: /s/ Linda Dakin-Grimm

10 Linda Dakin-Grimm (State Bar #119630)

Ldakin-grimm@milbank.com

11 Mark Shinderman (State Bar #136644)

12 MShinderman@milbank.com

13 Marina Markarian (State Bar #340686)

14 Mmarkarian@milbank.com

15 2029 Century Park East, 33<sup>rd</sup> Floor

16 Los Angeles, CA 90067

Telephone: 424.386.4000

Facsimile: 213.629.5063

17 Elizabeth Hamilton, *pro hac vice*

18 55 Hudson Yards

19 New York, New York 10001

20 Telephone: 212-530-5000

21 Facsimile: 212-530-5219

Email: Ehamilton@milbank.com

22 *Pro Bono* Attorneys for Plaintiffs,  
23 Esvin Fernando Arredondo Rodriguez and  
24 A.F.A.J.